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11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

11 UNIVERSAL NORTH AMERICA
INSURANCE COMPANY, a Texas
12 corporation,

13 Plaintiff,

14 vs.

15 Wendy Colosi, an individual; Victor Colosi, an
individual; Nicholas Colosi, an individual;
16 Marilyn Kennedy, an individual; DOES 1-20
and ROE CORPORATIONS 1 - 20, inclusive,

17 Defendants.
18

CASE NO.: 2:17-cv-00113 -JAD-GWF

**STIPULATION AND ORDER TO EXTEND
DEADLINE FOR PLAINTIFF TO RESPOND TO
DEFENDANT'S OPPOSITION TO PLAINTIFF
UNIVERSAL NORTH AMERICA INSURANCE
COMPANY'S MOTION FOR SUMMARY
JUDGMENT ON ALL CLAIMS**

(FIRST REQUEST)

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20 Pursuant to LR 6-1, Plaintiff Universal North America Insurance Company ("Universal")
21 and Defendant Marilyn Kennedy ("Kennedy"), by and through their respective counsel of record,
22 respectfully submit the following stipulation requesting a seven (7) day extension for Universal to
23 file a Reply to *Defendant's Opposition to Plaintiff Universal North America Insurance Company's*
24 *Motion for Summary Judgment on All Claims* [dkt. 36], to and including September 26, 2017.
25 Universal's *Motion for Summary Judgment on All Claims* [dkt. 30] was filed on August 15, 2017
26 and *Defendant's Opposition to Plaintiff Universal North America Insurance Company's Motion*
27 *for Summary Judgment on All Claims* was filed on September 5, 2017. In support of this
28 Stipulation, the parties state as follows:

1 **A. Introduction**

2 Universal insured Defendants Wendy, Victor and Nicholas Colosi (the “Colosi
3 Defendants”), who are also defendants in a personal injury action filed by Kennedy. Universal
4 filed this declaratory relief action seeking a declaration regarding its duties and obligations to the
5 Colosi Defendants with respect to the lawsuit against them filed by Kennedy.

6 **B. Reason for Extension**

7 The parties believe that a seven (7) day extension of the deadline to file a reply is
8 necessary and appropriate to provide sufficient time to complete an adequate reply. Universal’s
9 counsel requested the extension since she was on vacation for several days prior to the deadline for
10 the Reply to be filed, which adversely interfered with Universal’s opportunity to complete its
11 Reply in support of its motion for summary judgment. Universal and Kennedy believe that good
12 cause is demonstrated and both agreed to a seven (7) day extension of the deadline to respond.

13 Dated this 19th day of September, 2017

Dated this 19th day of September, 2017

14 **Attorneys for Marilyn Kennedy**

Attorneys for Universal

15
16 /s/ Gina M. Mushmeche, Esq.


/s/ Priscilla O’Briant, Esq.

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25 IT IS SO ORDERED this 19th day of September, 2017.

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27 
28 UNITED STATES DISTRICT JUDGE